# **Section 1. Registration Information**

#### Source Identification

**Facility Name** 

Parent Company #1 Name Parent Company #2 Name Lake Arlington Compressor Station Crestwood Midstream Partners

## Submission and Acceptance

Submission Type

Subsequent RMP Submission Reason

Description

Receipt Date
Postmark Date
Next Due Date

Completeness Check Date

Complete RMP

De-Registration / Closed Reason

De-Registration / Closed Reason Other Text

De-Registered / Closed Date

De-Registered / Closed Effective Date

Certification Received

First-time submission

12-Mar-2012

12-Mar-2012 12-Mar-2012

12-Mar-2017 01-Mar-2017

Yes

#### Facility Identification

**EPA Facility Identifier** 

Other EPA Systems Facility ID Facility Registry System ID

1000 0021 6508

## **Dun and Bradstreet Numbers (DUNS)**

**Facility DUNS** 

Parent Company #1 DUNS Parent Company #2 DUNS

#### Facility Location Address

Street 1

Street 2

City State ZIP

ZIP4

County

6900 E Rosedale Dr

Fort Worth TEXAS 76112

**TARRANT** 

9721096

#### Facility Latitude and Longitude

Latitude (decimal) Longitude (decimal) Lat/Long Method

Lat/Long Description

Horizontal Accuracy Measure
Horizontal Reference Datum Name

Source Map Scale Number

32 726588

-97 211247

Address Matching - Block Face

Administrative Building

10

World Geodetic System of 1984

Owner or Operator

**Operator Name** 

Operator Phone

Crestwood Midstream Partners

(682) 444-0166

Mailing Address

**Operator Street 1** Operator Street 2 **Operator City** 

**Operator State** Operator ZIP Operator ZIP4

Operator Foreign State or Province

Operator Foreign ZIP Operator Foreign Country 1200 Summit Ave

**Suite 320** Ft Worth **TEXAS** 76102

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person RMP Title of Person or Position

RMP E-mail Address

Jayson Treadaway **Director of Operations** 

jason treadaway@crestwoodlp com

**Emergency Contact** 

**Emergency Contact Name Emergency Contact Title** 

**Emergency Contact Phone Emergency Contact 24-Hour Phone** 

**Emergency Contact Ext or PIN Emergency Contact E-mail Address**  Elvis Pressley

Operations Leadman (682) 444-0166 (682) 444-0166

elvis pressley@crestwoodlp com

Other Points of Contact

Facility or Parent Company E-mail Address Facility Public Contact Phone Facility or Parent Company WWW Homepage Address

Local Emergency Planning Committee

**LEPC** 

**Tarrant County LEPC** 

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site

FTE Claimed as CBI

Covered By

**OSHA PSM EPCRA 302** CAA Title V

Yes

Yes

Air Operating Permit ID

#### **OSHA** Ranking

**OSHA Star or Merit Ranking** 

## Last Safety Inspection

Last Safety Inspection (By an External Agency)

Date

Last Safety Inspection Performed By an External

Agency

Never had one

#### Predictive Filing

Did this RMP involve predictive filing?

## **Preparer Information**

Preparer Phone
Preparer Street 1
Preparer Street 2

Preparer Street 2
Preparer City
Preparer State
Preparer ZIP
Preparer ZIP4

Preparer Foreign State
Preparer Foreign Country
Preparer Foreign ZIP

Jason Perrin (469) 767-8296 6217 Chapel Hill Blvd

Suite 300 Plano TEXAS 75093

## Confidential Business Information (CBI)

**CBI Claimed** 

Substantiation Provided Unsanitized RMP Provided

## Reportable Accidents

Reportable Accidents

See Section 6 Accident History below to determine if there were any accidents reported for this RMP

## **Process Chemicals**

Process ID

1000031223

Description

Lake Arlington Comp Sta

Process Chemical ID

1000037822

Program Level

Program Level 3 process

Chemical NameMethaneCAS Number74-82-8Quantity (lbs)20000

**CBI** Claimed

Flammable/Toxic

Flammable

## **Process NAICS**

 Process ID
 1000031223

 Process NAICS ID
 1000031534

Program Level 3 process

NAICS Code 211112

NAICS Description Natural Gas Liquid Extraction

# **Section 2. Toxics: Worst Case**

# **Section 3. Toxics: Alternative Release**

## Section 4. Flammables: Worst Case

Flammable Worst ID 1000018894

Model Used Endpoint used EPA's RMP\*Comp(TM)
1 PSI

Passive Mitigation Considered
Blast Walls
Other Type

# Section 5. Flammables: Alternative Release

Flammable Alter ID 1000017675

Model Used

EPA's RMP\*Comp(TM)

Passive Mitigation Considered

Dikes

Fire Walls

Blast Walls

**Enclosures** 

Other Type

Active Mitigation Considered

Sprinkler System

Deluge System

Water Curtain

Excess Flow Valve

Other Type

# **Section 6. Accident History**

# Section 7. Program Level 3

Description

No description available

Program Level 3 Prevention Program Chemicals

1000032515 Prevention Program Chemical ID Chemical Name Methane Flammable/Toxic Flammable **CAS Number** 74-82-8

Process ID 1000031223

Description Lake Arlington Comp Sta

Prevention Program Level 3 ID 1000027056 **NAICS Code** 211112

Safety Information

Safety Review Date (The date on which the safety 01-Dec-2016

information was last reviewed or revised)

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA 11-Nov-2015

update)

The Technique Used

What If Yes

Checklist What If/Checklist **HAZOP** 

Failure Mode and Effects Analysis

Fault Tree Analysis Other Technique Used

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update)

15-Feb-2016

Major Hazards Identified

Toxic Release

Fire Yes Yes Explosion

Runaway Reaction Polymerization Overpressurization Corrosion

Overfilling Yes

Contamination **Equipment Failure** Yes

Loss of Cooling, Heating, Electricity, Instrument Air

## EPA Facility Identifier 1000 0021 6508

Earthquake

Floods (Flood Plain)

Tornado Hurricanes Yes

Other Major Hazard Identified

#### Process Controls in Use

Vents

Yes

Relief Valves

Yes

Check Valves

Yes

Scrubbers

Yes

Flares

Manual Shutoffs

Yes

Automatic Shutoffs

Yes

Interlocks

Yes

Alarms and Procedures

Yes

Keyed Bypass

Emergency Air Supply

. . . .

**Emergency Power** 

Backup Pump

Yes

Grounding Equipment

Inhibitor Addition

Rupture Disks

**Excess Flow Device** 

Quench System

Purge System

None

Other Process Control in Use

## Mitigation Systems in Use

Sprinkler System

Dikes

Yes

Fire Walls

Blast Walls

Deluge System

Water Curtain

Enclosure

Neutralization

None

Other Mitigation System in Use

#### Monitoring/Detection Systems in Use

**Process Area Detectors** 

Yes

Perimeter Monitors

None

Other Monitoring/Detection System in Use

#### Changes Since Last PHA Update

Reduction in Chemical Inventory

Increase in Chemical Inventory

Change Process Parameters

EPA Facility Identifier 1000 0021 6508

Installation of Process Controls

Installation of Process Detection Systems

Installation of Perimeter Monitoring Systems

Installation of Mitigation Systems

None Recommended

None

Yes

Other Changes Since Last PHA or PHA Update

## **Review of Operating Procedures**

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures) 20-Nov-2016

#### Training

Training Revision Date (The date of the most recent 24-Jan-2017 review or revision of training programs)

## The Type of Training Provided

Classroom

Yes

On the Job

Yes

Other Training

## The Type of Competency Testing Used

Written Tests

Yes

Oral Tests

Demonstration

Yes

Observation

Yes

Other Type of Competency Testing Used

#### Maintenance

Maintenance Procedures Revision Date (The date of 20-Nov-2016 the most recent review or revision of maintenance procedures)

Equipment Inspection Date (The date of the most recent equipment inspection or test)

25-Aug-2016

Equipment Tested (Equipment most recently inspected or tested)

**PSVs** 

#### Management of Change

Change Management Date (The date of the most recent change that tnggered management of change procedures)

12-Dec-2016

Change Management Revision Date (The date of the most recent review or revision of management of change procedures)

16-Oct-2015

#### Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review)

22-Sep-2016

## Compliance Audits

Compliance Audit Date (The date of the most recent 02-Dec-2016 compliance audit)

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit)

#### Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any))

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation)

26-Oct-2016

01-Nov-2016

## **Employee Participation Plans**

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans)

16-Oct-2015

## Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most 16-Oct-2015 recent review or revision of hot work permit procedures)

#### Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures)

16-Oct-2015

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance)

16-Oct-2015

#### Confidential Business Information

**CBI Claimed** 

# Section 8. Program Level 2

# Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?)

Yes

Facility Plan (Does facility have its own written emergency response plan?)

Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?)

Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?) Yes

Healthcare (Does facility's ER plan include information on emergency health care?)

Yes

#### **Emergency Response Review**

Review Date (Date of most recent review or update 15-Jan-2017 of facility's ER plan)

## **Emergency Response Training**

Training Date (Date of most recent review or update 15-Jan-2017 of facility's employees)

#### Local Agency

Agency Name (Name of local agency with which the Tarrant County LEPC facility ER plan or response activities are coordinated)

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated)

(817) 884-1804

## Subject to

OSHA Regulations at 29 CFR 1910 38 Yes OSHA Regulations at 29 CFR 1910 120 Clean Water Regulations at 40 CFR 112

Yes

RCRA Regulations at CFR 264, 265, and 279 52

Yes

OPA 90 Regulations at 40 CFR 112, 33 CFR 154. 49 CFR 194, or 30 CFR 254

Yes

State EPCRA Rules or Laws

Other (Specify)

## **Executive Summary**

Executive Summary - Lake Arlington Gas Plant

Crestwood Midstream Partners LP, owner and operator of the Lake Arlington Gas Plant, has a long-standing commitment to worker and public safety. This commitment is demonstrated by the resources invested in accident prevention, such as training personnel and considering safety in the design, installation, operation, and maintenance of our processes. Crestwood's policy is to implement reasonable controls to prevent foreseeable releases of regulated substances. However, if a release does occur, facility trained personnel will respond to control and contain the release.

Description of the Stationary Source and Regulated Substances

Natural gas is gathered from wells in the surrounding fields and sent to Lake Arlington for processing prior to being sold for domestic consumption. Lake Arlington gas contains water that must be brought into specification before residue companies will purchase this gas.

Lake Arlington is designed to remove water with Tri-ethylene glycol (TEG). Steam vapors from the TEG units are condensed and disposed of properly. Three glycol units operate in a continuous loop, treating gas and regenerating treatment fluids. These systems are highly automated and operate with minimal interruptions.

Gas flow into this facility is at low pressure, approximately 150 psig. Sales line pressure ranges from 850 to 1000 psig, therefore this gas requires boost compression. Lake Arlington includes electric and gas fired driven compression units that boost gas up to sales line pressure.

Auxiliary equipment consists of lube oil, methanol, antifreeze, glycol, and drain system storage. Lake Arlington has air compression/drying equipment, and gas lift compression. This facility is also equipped with a control room, various motor control rooms and a vent system.

For a more detailed description of this facility please consult this Operating Manual and study facility process and instrument diagrams

The processes at the plant are interconnected by piping and fit the EPA's definition of a stationary source in 40 CFR part 68. The facility contains three sources of regulated substances held over their respective threshold quantities, plant gas consisting of mostly methane.

General Accident Release Prevention and Program Information

The following is a summary of the accident prevention program in place for the process at the facility. Because the processes at the Lake Arlington Gas Plant that are regulated by the Environmental Protection Agency's (EPA's) risk management program (RMP) regulation are also subject to the Occupational Safety and Health Administration's (OSHA's) process safety management (PSM) standard, this summary addresses each of the OSHA PSM elements and describes the management system in place to implement the accident prevention program.

**Employee Participation** 

Crestwood Midstream Partners LP encourages employees to participate in all facets of process safety management and accident prevention. Examples of employee participation range from updating and compiling technical documents and chemical information to participating as a member of a process hazard analysis (PHA) team. Employees have access to all information created as part of the facility accident prevention program. Specific ways that employees can be involved in the accident prevention program are documented in an employee participation plan that is maintained at the facility

Process Safety Information

Crestwood Midstream Partners LP keeps a variety of technical documents that are used to help maintain safe operation of the processes. These documents address chemical properties and associated hazards, limits for key process parameters and specific chemical inventories, and equipment design basis/configuration information. The reference documents are maintained on file at the

facility to provide open access

Chemical-specific information, including exposure hazards and emergency response/exposure treatment considerations, is provided in material safety data sheets (MSDSs). This information is supplemented by documents that specifically address known corrosion concerns and any known hazards associated with the inadvertent mixing of chemicals. For the process, the facility has documented safety-related limits for specific process parameters (e.g., temperature, level, composition) in key process parameter documents. The facility ensures that the process is maintained within these limits using process controls and monitoring instruments, highly trained personnel, and protective instrument systems (e.g., automated shutdown systems). The Lake Arlington Gas Plant also maintains numerous technical documents that provide information about the design and construction of process equipment. This information includes materials of construction, design pressure and temperature ratings, and electrical rating of equipment. This information, in combination with written procedures and trained personnel, provides a basis for establishing inspection and maintenance activities, as well as for evaluating proposed process and facility changes to ensure that safety features in the process are not compromised.

Process Hazard Analysis (PHA)

Crestwood Midstream Partners LP has a comprehensive program to help ensure that hazards associated with the process are identified and controlled. Within this program, each process is systematically examined to identify hazards and ensure that adequate controls are in place to manage these hazards.

Crestwood Midstream Partners LP primarily used the hazard and operability (HAZOP) analysis technique to perform this evaluation HAZOP analysis is recognized as one of the most systematic and thorough hazard evaluation techniques. The analyses are conducted using a team of people who have operating and maintenance experience as well as engineering expertise. This team identifies and evaluates hazards of the process as well as accident prevention and mitigation measures, and the team makes suggestions for additional prevention and/or mitigation measures when the team believes such measures are necessary

The PHA team findings are forwarded to local and corporate management for resolution 
Implementation of mitigation options in response to PHA findings is based on a relative risk ranking assigned by the PHA team 
This ranking helps ensure that potential accident scenarios assigned the highest risk receive immediate attention 
All approved mitigation options in response to PHA team 
findings are tracked until they are completed 
The final resolution of each finding is documented and retained

To help ensure that the process controls and/or process hazards do not eventually deviate significantly from the original design safety features, the Lake Arlington Gas Plant periodically updates and revalidates the hazard analysis results. These periodic reviews are conducted when major changes occur at the facility. The results and findings from these updates are documented and retained. Once again, the team findings are forwarded to management for consideration, and the final resolution of the findings is documented and retained.

#### **Operating Procedures**

Lake Arlington Gas Plant maintains written procedures that address various modes of operations, such as (1) unit startup, (2) normal operations, (3) temporary operations, (4) emergency shutdown, (5) normal shutdown, and (6) initial startup of a new process. These procedures can be used as a reference by experienced operators and provide a basis for consistent training of new operators. These procedures are periodically reviewed and annually certified as current and accurate. The procedures are kept current and accurate by revising them as necessary to reflect changes made through the management of change process.

In addition, the Lake Arlington Gas Plant maintains key process parameter documents that provide guidance on how to respond to upper or lower limit exceedence for specific process or equipment parameters. This information, along with written operating procedures, is readily available to operators in the process unit and for other personnel to use as necessary to safely perform their job tasks.

#### Training

To complement the written procedures for process operations, the Lake Arlington Gas Plant has implemented a comprehensive training program for all employees involved in operating a process. New employees receive basic training in facility operations if

they are not already familiar with such operations. After successfully completing this training, a new operator is paired with a senior operator to learn process-specific duties and tasks. After operators demonstrate (e.g., through tests, skills demonstration) having adequate knowledge to perform the duties and tasks in a safe manner on their own, they can work independently. In addition, all operators periodically receive refresher training on the operating procedures to ensure that their skills and knowledge are maintained at an acceptable level. This refresher training is conducted on an as needed basis. All of this training is documented for each operator, including the means used to verify that the operator understood the training.

#### Contractors

The Lake Arlington Gas Plant uses contractors to supplement its workforce during periods of increased maintenance or construction activities. Because some contractors work on or near process equipment, the plant has procedures in place to ensure that contractors (1) perform their work in a safe manner, (2) have the appropriate knowledge and skills, (3) are aware of the hazards in their workplace, (4) understand what they should do in event of an emergency, (5) understand and follow site safety rules, and (6) inform facility personnel of any hazards that they find during their work. This is accomplished by providing contractors with (1) a process overview, (2) information about safety and health hazards, (3) emergency response plan requirements, and (4) safe work practices prior to their beginning work. In addition, Crestwood Midstream Partners LP has a program in place to evaluate contractor safety programs and performance. Facility personnel periodically monitor contractor performance to ensure that contractors are fulfilling their safety obligations.

#### Pre-startup Safety Reviews (PSSRs)

Crestwood Midstream Partners LP conducts a PSSR for any new facility or facility modification that requires a change in the process safety information. The purpose of the PSSR is to ensure that safety features, procedures, personnel and equipment are appropriately prepared for startup prior to placing the equipment into service. This review provides one additional check to make sure construction is in accordance with the design specifications and that all supporting systems are operationally ready. The PSSR team uses checklists to verify all aspects of readiness. A PSSR involves field verification of the construction and serves as a quality assurance function by requiring that accident prevention program requirements are properly implemented.

#### Mechanical Integrity

Crestwood Midstream Partners LP has well-established practices and procedures to maintain pressure vessels, piping systems, relief and vent systems, controls, pumps and compressors, and emergency shutdown systems in a safe operating condition. The basic aspects of this program include. (1) conducting training, (2) developing written procedures, (3) performing inspections and tests, (4) correcting identified deficiencies, and (5) applying quality assurance measures. In combination, these activities form a system that maintains the mechanical integrity of the process.

Maintenance personnel receive training on (1) an overview of the process, (2) safety and health hazards, (3) applicable maintenance procedures, (4) emergency response plans, and (5) applicable safe work practices to help ensure that they can perform their jobs in a safe manner. Job plans/written procedures help ensure that work is performed in a consistent manner and provide a basis for training. Inspections and tests are performed to help ensure that equipment functions as intended and to verify that equipment is within acceptable limits (e.g., adequate wall thickness for pressure vessels). If a deficiency is identified, employees will correct the deficiency before placing the equipment back into service (if possible), or a management of change team will review the use of the equipment and determine what actions are necessary to ensure the safe operation of the equipment

Another integral part of the mechanical integrity program is quality assurance. The Lake Arlington Gas Plant incorporates quality assurance measures into equipment purchases and repairs. This helps ensure that new equipment is suitable for its intended use and that proper materials and spare parts are used when repairs are made.

#### Safe Work Practices

Crestwood Midstream Partners LP has long-standing safe work practices in place to help ensure worker and process safety Examples of these include, (1) control of the entry/presence/exit of support personnel, (2) a lockout/tagout procedure to ensure isolation of energy sources for equipment undergoing maintenance, (3) a procedure for safe removal of hazardous substances before process piping or equipment is opened, (4) a permit and procedure to control spark-producing activities (i e , hot work) and

(5) a permit and procedure to ensure that adequate precautions are in place before entry into a confined space. These procedures (and others), along with training of affected personnel, form a system to help ensure that operations and maintenance activities are performed safely

#### Management of Change

Crestwood Midstream Partners LP has a comprehensive system to manage changes to all covered processes. This system requires that changes to items such as process equipment, chemicals, technology (including process operating conditions), procedures, and other facility changes be properly reviewed and authorized before being implemented. Changes are reviewed to (1) ensure that adequate controls are in place to manage any new hazards and to (2) verify that existing controls have not been compromised by the change. Affected chemical hazard information, process operating limits, and equipment information, as well as procedures, are updated to incorporate these changes. In addition, operating and maintenance personnel are provided any necessary training on the change.

#### Incident Investigation

Crestwood Midstream Partners LP promptly investigates all incidents that resulted in, or reasonably could have resulted in, a fire/explosion, release, major property damage, environmental loss, or personal injury. The goal of each investigation is to determine the facts, and develop corrective actions to prevent a recurrence of the incident or a similar incident. The investigation team documents its findings, develops recommendations to prevent a recurrence, and forwards these results to facility management for resolution. Corrective actions taken in response to the investigation team's findings and recommendations are tracked until they are complete. The final resolution of each finding or recommendation is documented, and the investigation results are reviewed with all employees (including contractors) who could be affected by the findings. Incident investigation reports are retained for at least 5 years so that the reports can be reviewed during PHAs and PHA revalidations.

#### Compliance Audits

To help ensure that the accident prevention program is functioning properly, Crestwood Midstream Partners LP periodically conducts an audit to determine whether the procedures and practices required by the accident prevention program are being implemented. Compliance audits are conducted on a periodic basis. Both hourly and staff personnel participate as audit team members. The audit team develops findings that are forwarded to facility management for resolution. Corrective actions taken in response to the audit team's findings are tracked until they are complete. The final resolution of each finding is documented, and the two most recent audit reports are retained.

#### Chemical - Specific Prevention Steps

The processes at the Lake Arlington Gas Plant have hazards that must be managed to ensure continued safe operation. The following is a description of existing safety features applicable to the prevention of accidental releases of regulated substances in the facility.

#### Universal Prevention Activities

The accident prevention program summarized previously is applied to all RMP-covered processes at the Lake Arlington Gas Plant Collectively, these prevention program activities prevent or mitigate potential accident scenarios that could be caused by equipment failures and human errors

#### Specialized Safety Features

The Lake Arlington Gas Plant has safety features on many units to help (1) contain/control a release, (2) quickly detect a release, and (3) reduce the consequences of (mitigate) a release. The following types of safety features are used in the covered process

#### Release Detection

#### 1 Tanks are gauged

2 Tanks/vessels are equipped with level and pressure sensors

#### Release Containment/Control

- 1 Berms around condensate tanks
- 2 Process relief valves venting vapors to the atmosphere to prevent vessels from rupturing
- 3 Process relief valves that discharge to a flare to capture and incinerate episodic releases
- 4 Valves to permit isolation of the process (manual and automated)
- 5 Automated shutdown systems for specific process parameters (e.g., high temperature)
- 6 Redundant equipment and instrumentation (e.g., uninterruptible power supply for process control system)

#### Release Mitigation

- 1 Trained emergency response personnel
- 2 Personal protective equipment (e.g., chemical protective clothing)
- 3 SPCC Plan

#### **Emergency Response Program Information**

The Lake Arlington Gas Plant maintains a written emergency response program, which is in place to protect worker and public safety as well as the environment. The program consists of procedures for responding to the release of a regulated substance, including the possibility of a fire or explosion if a flammable substance is accidentally released. The procedures address all aspects of emergency response, including proper first aid and medical treatment for exposures, evacuation plans and accounting for personnel after an evacuation, notification of local emergency response agencies and the public if a release occurs, and post incident cleanup and decontamination requirements. In addition, the facility has procedures that address maintenance, inspection, and testing of emergency response equipment, as well as instructions that address the use of emergency response equipment. Employees receive training in these procedures as necessary to perform their specific emergency response duties. The emergency response program is updated when necessary based on modifications made to facility processes. The emergency response program changes are administered through the Management of Change (MOC) process, which includes informing and/or training affected personnel in the changes. Periodic drills or tabletop exercises are conducted to test the response plan.

The overall emergency response program for the Lake Arlington Gas Plant is coordinated with the Tarrant County Local Emergency Planning Committee (LEPC) at 817-884-1804. This coordination includes periodic meetings of the committee, which includes local emergency response officials, local government officials, and industry representatives. The Lake Arlington Gas Plant has around-the-clock communications capability. Crestwood Midstream Partners LP operators are automatically called in the event of a process upset. The operator will then call the appropriate emergency response organizations (e.g., fire department). This provides a means of notifying the public of an incident, if necessary, as well as facilitating quick response to an incident. In addition to periodic LEPC meetings, the Crestwood Midstream Partners LP conducts periodic emergency drills that involve emergency response organizations, and the Lake Arlington Gas Plant provides annual refresher training to local emergency responders regarding the hazards of regulated substances in the facility

Five - Year Accident History

The Lake Arlington Gas Plant has had no accidents in the last five years

#### Planned Changes to Improve Safety

The Lake Arlington Gas Plant resolves all findings from PHAs, some of which result in modifications to the process. The most Recent PHA was conducted on November, 11th, 2015. The following types of changes are planned in response to PHA, safety audit, and incident investigation findings.

Planned Change Expected Completion Date Added secondary containment 11/01/2016